

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 283 & 392

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, proposed counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On December 21, 2022, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors for Entry of an Order (A) Authorizing the Debtors to Enter into the Stipulation with Voyager Digital, LLC and (B) Granting Related Relief* [D.I. 283] (the “Motion”).

2. As of the date hereof, no formal objection or other responses to the Motion have been filed or served on the Debtors. The Debtors received informal comments (the “Informal Comments”) to the Stipulation, as defined in the Motion and attached as an exhibit thereto, from the Official Committee of Unsecured Creditors (the “Committee”). To resolve the Informal Comments, the Debtors have revised the Stipulation (the “Revised Stipulation”).

3. On January 6, 2023, the Debtors filed a *Notice of Filing Revised Stipulation* [D.I. 392], attaching thereto a copy of the Revised Stipulation as **Exhibit 1**.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

4. No changes have been made to the proposed form of order filed with the Motion (the “Proposed Order”), a copy of which is attached hereto for the Court’s convenience as **Exhibit A**. The Revised Stipulation was circulated to Voyager Digital, LLC, the office of the United States Trustee and the Committee, who advised they do not object to entry of the Proposed Order. In accordance with the Court’s electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

5. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: January 6, 2023
Wilmington, Delaware

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/s/ Kimberly A. Brown

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*Proposed Counsel for the Debtors
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